## Department of Environmental Resources

1875 New Mope Street Norristown, PA 19401 215-270-1975

October 26, 1989

David R. Haldeman, Environmental Engineer Scott Worldwide Scott Paper Company Front & Avenue of the States Chester, PA 19013

( 2/89

Re: Industrial Waste/Groundwater Pollution Scott Paper Company City of Chester, Delaware County

Dear Mr. Haldeman:

This is to confirm the results of our September 8, 1989 inspection relative to the closure of seven (7) underground storage tanks. Contaminated soil and groundwater were encountered around several of the tanks that had already been excavated.

The unpermitted discharge of industrial waste to waters of the Commonwealth (including groundwater) is a violation of Section 307 of the Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended. In addition, Section 316 of the Clean Streams Law requires that landowners or occupiers correct conditions which are causing or have the potential to cause pollution.

We are requesting that Scott Paper Company take the following actions to correct and mitigate the effects of this groundwater pollution problem:

- 1. No later than November 30, 1989, to retain a qualified hydrogeologist and submit to the Department for approval, a work plan describing the scope and methods of a hydrogeologic study to determine the extent and impact of soil and groundwater contamination at and in the vicinity of the seven (7) underground storage tanks. The work plan should include target dates for completion of the various tasks comprising the study including a final report and recommendations. The scope of the study should include as a minimum:
- 2. Definition of the present extent of soil and groundwater pollution.
- 3. Evaluation of the potential for further spread of soil and groundwater pollution.

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- 4. Definition of all sources of the pollution and a description of the means and methods proposed or used for the elimination of said sources.
- 5. Evaluation of alternatives available to abate the soil and groundwater pollution.
- 6. A groundwater quality monitoring program which will allow for evaluation of long-term groundwater quality conditions and which will ensure the protection of public health.
- 7. Conclusions and proposed actions to abate the soil and groundwater pollution and a schedule for accomplishing such actions.

If you have any questions, please contact Richard Breitenstein at 215-270-1975. Very truly years,

CYNTHIA L. STEELE Water Quality Specialist Supervisor

cc: City of Chester Compliance and Monitoring Section Re (30 MO298.54